

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING  
COMPANIES, INC., DISNEY  
ENTERPRISES, INC., TWENTIETH  
CENTURY FOX FILM CORPORATION,  
CBS BROADCASTING INC., CBS STUDIOS  
INC., FOX TELEVISION STATIONS, LLC,  
FOX BROADCASTING COMPANY, LLC,  
NBCUNIVERSAL MEDIA, LLC,  
UNIVERSAL TELEVISION LLC, and OPEN  
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS  
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136 (LLS)

**STIPULATION AND [PROPOSED] ORDER REGARDING  
DEFENDANTS' ANSWER TO AMENDED COMPLAINT AND COUNTERCLAIMS**

Plaintiffs, American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (“Plaintiffs”), and Defendants, David R. Goodfriend and Sports Fans Coalition NY, Inc. (“Defendants”), by and through their counsel, respectfully submit this Stipulation and Proposed Order regarding Defendants’ Answer to Amended Complaint and Counterclaims.

Pursuant to the Court’s January 31, 2020 and September 3, 2020 Scheduling Orders, Plaintiffs on October 30, 2020 filed an Amended Complaint (Dkt. No. 81) for the sole purpose of adding a new Exhibit C “that list[s] additional infringed works.” Scheduling Order at 6 (Jan. 31,

2020) (Dkt. No. 59). No other substantive allegations were added. On November 13, 2020, Defendants in response filed an Answer to Amended Complaint and Counterclaims (Dkt. No. 88) with no substantive changes to the original Answer and Counterclaims (Dkt. No. 29) they filed on September 26, 2019.

In the interest of efficiency and conserving resources, the parties hereby jointly stipulate to the withdrawal of the Answer to Amended Complaint and Counterclaims on the ground that Defendants' original pleading is a fully sufficient response to Plaintiffs' October 30, 2020 Amended Complaint, which did nothing more than add additional works. The parties jointly stipulate that the original pleading fully denies liability and asserts all the same defenses as to those additional works.

Dated: December 1, 2020

Respectfully submitted,

/s/ Elizabeth E. Brenckman

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*Attorneys for Defendants David R. Goodfriend  
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On this \_\_\_\_ day of December, 2020,

Approved By:

\_\_\_\_\_  
The Honorable Louis L. Stanton  
United States District Judge

/s/ Thomas G. Hentoff

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